



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

977024

August 11, 2022

Ms. Shari Kolak
Remedial Project Manager
U.S. EPA, Region 5
SR-6J
77 West Jackson Boulevard
Chicago, IL 60604

Re: Troy Well Field Unknown Source
Remediation Response
Project Records
Remedial Response
Miami County
555001353012

Transmitted via email to: kolak.shari@epa.gov

Subject: Pre-Design Investigation Data Evaluation Report – Ohio EPA Review

Dear Ms. Kolak:

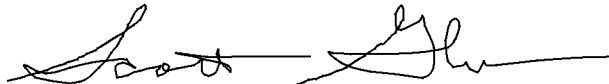
On July 25, 2022, the Ohio EPA Division of Environmental Response and Revitalization (DERR) received the Pre-Design Investigation (PDI) Data Evaluation Report for the East Troy Contaminated Aquifer Site in Troy, Miami County, Ohio. DERR is providing the following comments for your consideration.

1. General Comment. Soil samples collected for volatile organic compounds (VOCs) analysis from sampling grids SBB6, SBB7, SBG3, SBH3, SBI1, SBI2, and SBI3 on April 14, 2022, were received by the lab on April 18, 2022, at a temperature of 15.2°C. This is well above the ≤6°C temperature preservation requirement specified in the Quality Assurance Project Plan. The lab, Pace Analytical Services, analyzed the soil samples and qualified all detections as estimated values due to the elevated temperature of the samples and because the results may be biased low. Several of these soil samples had detections of PCE and/or TCE at concentrations slightly below the site cleanup levels of 44 µg/kg for PCE and 34 µg/kg for TCE. These include SBB6 (4-6', TCE at 30J µg/kg), SBG3 (0-2', PCE at 28J µg/kg), SBG3 (4-6', PCE at 27J µg/kg), and I3 (4-6', PCE at 36J µg/kg). Since soil samples are subject to volatile organics loss at higher temperatures, it is possible these samples would have exceeded cleanup levels if they had arrived at the lab on time and at the required temperature of ≤6°C. Therefore, Ohio EPA recommends that grids B6 (4-6'), G3 (0-2' and 4-6'), and I3 (4-6') be resampled for VOCs in soil, or that the soil excavation area be expanded to include these grids and depths. See also Comment 3 below.

2. Section 3.2.1, Contaminant Delineation Sample Collection, page 6. The text does not specify if soil samples were collected by En Core® or Terra Core methods for VOC analysis. Also, the text does not specify if soil samples were field preserved with methanol or sodium bisulfite to reduce volatilization and biodegradation. Please clarify the soil sampling method used and whether soil samples were field preserved to minimize loss of VOCs.
3. Section 4.2.1, Contaminant Delineation Sample Results, page 12. The text discusses several areas where uncertainty exists with respect to excavation boundaries based on the PDI soil sampling results. Please expand this section to include discussion of the uncertainties regarding the elevated temperature samples collected from grids B6, G3, and I3 and the potential for biased low analytical results. See Comment 1 above.

If you have any questions, please contact me at (937) 285-6065 or by email at Scott.Glum@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott Glum', with a long horizontal line extending to the right.

Scott Glum
Site Coordinator
Division of Environmental Response and Revitalization

SG/rw

ec: Mark Rickrich, DERR/CO
Gavin Armstrong, DERR/CO